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May 5, 2020

Honorable Jerrold N. Poslusny, Jr., U.S.B.J.  
United States Bankruptcy Court  
PO Box 2067  
Camden, NJ 08101  
*Via electronic mail to: ([chambers\\_of\\_jnp@njb.uscourts.gov](mailto:chambers_of_jnp@njb.uscourts.gov)) only*

Re: Sandra J. May  
Chapter 13 Case No.: 19-27812  
Confirmation hearing scheduled for May 6, 2020  
Motion for relief from the stay scheduled for May 19, 2020

Dear Judge Poslusny,

Kindly accept this letter as a status report and request for adjournment of the confirmation hearing scheduled for May 6, 2020.

We understand that secured creditor McCormick 105, LLC has filed opposition to the confirmation and seeks dismissal. This creditor has also filed a motion for relief from stay, scheduled for May 19, 2020.

For confirmation, there is a wage order in favor of the Trustee, and we believe that the debtor is materially current with Trustee payments. We believe we have addressed all of the issues on the Trustee's tentative disposition list, however, do concede that the debtor has been unable to provide the State of New Jersey Division of Taxation with a copy of her 2017 tax return. She has consulted with her accountant who is presently not seeing clients in person, and the two of them are attempting to prepare this return, and she would like to have some time to have the return prepared. Please note that all other tax returns have been prepared and filed, and there was an oversight either by Ms. May and her accountant or the State of New Jersey with regards to this 2017 return.

As far as McCormick 105, LLC, Ms. May is in the process of modifying her plan to call for the surrender of the Philadelphia property to all lienholders including McCormick 105, LLC. This is why we seek a postponement to confirmation.

Ms. May will continue to market the property but does realize that she would need to sell the property before there is a sheriff's sale. She understands that there is an assignment of rents and as a result has amended schedules I and J of her bankruptcy petition to delete references to income from the Philadelphia property and expenses relating to the Philadelphia property.

Ordinarily, I would be optimistic that a modified plan which calls for the surrender of collateral would address the secured creditor's objection to confirmation. However, I note that the motion for relief from the stay seeks relief as to both the Philadelphia property and another property located in Lower Township, Cape May County, New Jersey. Neither the debtor nor our office is familiar with this property and as such, Ms. May cannot consent to the entry of the form of order submitted.

Thank you for giving this matter your kind attention.

Respectfully yours,

*/s/ Eric J Clayman*

Eric J Clayman

EJC/aa

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